DOCUMENT RESUME

ED 200 074 HE 013 531

AUTHOR Davis, Gary
TITLE Institutional Research and External Agency Reporting Responsibility.
INSTITUTION Association for Institutional Research.
PUB DATE 81
NOTE 5p.
AVAILABLE FROM Association for Institutional Research, 314 Stone Building, Florida State University, Tallahassee, FL 32306.
JOURNAL CIT AIR Professional File; n8 Win 1980-81

EDRS PRICE MF01/PC01 Plus Postage.
DESCRIPTORS *Accountability; *Compliance (Legal); Confidential Records; Cost Effectiveness; *Data Analysis; Data Collection; Educational Malpractice; Educational Responsibility; Government School Relationship; Higher Education; Information Needs; Information Seeking; *Information Utilization; *Institutional Evaluation; *Institutional Research; Legal Responsibility; Privacy; Program Effectiveness; Reliability; Research Needs; Research Utilization; Student Records; Use Studies

ABSTRACT

Ways that higher education institutions can improve their compliance procedures in responding to external requests for reports and information are addressed. Institutional officers must first determine how the data will be used by the external agency. By questioning how the requested information will be used, a determination can be made of what kind of data is actually required. Institutional officers also need to ask whether laws protecting the privacy of individuals whose records are held will not be violated. Each request for data should be analyzed for its probable cost to the institution. The effective collection of institutional data requires at least seven steps, which are listed (including notifying affected departments, preparing appropriate data reporting formats, and incorporating the edited, tabulated data into the institution's information management system, or filing it, or recording it as an "occasional report"). The institution also needs to monitor the analysis of its data by external agencies to assure that the reported information is analyzed adequately and properly. An example of recurring, inadequate agency analysis of institutional data is the tendency of state agencies to ignore the distinction between fixed and variable costs faced by institutions with fluctuating enrollments. By reviewing the agency's use of data in decision-making, the institution can judge whether to provide a minimum of information or more extensive data. Once every three years, college and university administrators should prepare a careful summary tabulation of the number of external data requests that they have received and the ways in which each was processed. (SW)

The AIR Professional File — Winter 1980-81
The Association for Institutional Research — No. 8

U S DEPARTMENT OF HEALTH
EDUCATION & WELFARE
NATIONAL INSTITUTE OF
EDUCATION
THIS DOCUMENT HAS BEEN REPRODUCED EXACTLY AS RECEIVED FROM THE PERSON OR ORGANIZATION ORIGINATING IT. POINTS OF VIEW OR OPINIONS STATED DO NOT NECESSARILY REPRESENT OFFICIAL NATIONAL INSTITUTE OF EDUCATION POSITION OR POLICY

INSTITUTIONAL RESEARCH AND EXTERNAL AGENCY REPORTING RESPONSIBILITY

Gary Davis
Director of the Honors Program
Northwest Missouri State University

ED200074
TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)
"PERMISSION TO REPRODUCE THIS MATERIAL HAS BEEN GRANTED BY AIR
HE 013 531

The public interest, which must be recognized by public institutions, and the need for institutional and scholarly autonomy come into conflict at many points, and nowhere is this more critical than in the development of a comprehensive system-wide information system. Knowledge is power, and prior information results in prior power. The demand for additional information by coordinating boards and their staffs can be expected to grow—and grow—and grow.

*Fred C. Harcleroad**

Reports are used to judge the performance of colleges and universities. The public demand for accountability in the expenditure of public funds requires government to request and study performance reports from public institutions on a regular basis. Because expenditures for higher education consume a large share of total state revenues, legislators, governors, and the staff members of their supporting agencies have joined to create a multitude of reporting responsibilities for the officers of colleges and universities. Most institutions of higher education have little choice but to issue the requested reports since they are dependent for continued support on the beneficence of the public and its government agencies. They can, however, improve their compliance procedures by following several steps.

Analyzing the Request for Data

Determining how the data will be used. In order to comply appropriately with a data request from an external agency, institutional officers must first determine how the data will be used. Unless such a determination is made, a responding institutional officer may supply data which is unsuitable for the contemplated study. If the agency staff recognize the unsuitability of the data, the institution will probably be requested to generate a second, costly run of information. If the data's inappropriateness is *not* recognized, the agency may publish false or misleading information—ultimately an embarrassment for both the agency and the institution.

"It is important that a state agency be selective in the process of identifying data items," Roger Bassett (1979a, pp. 14–16) wrote in a publication of the National Center for Higher Education Management Systems (NCHEMS), "avoiding a collect-everything approach. . . . A state agency must consider institutional resources and capabilities, both short-term and long-term, for providing data."

To determine what kind of data is *actually* required, the institutional data provider should ask the agency staff how the requested information will be used. Agency refusal to be specific in response to this question should be viewed as a danger signal, indicating that no particular use has been identified and that the data might not be used at all. The documented existence of much unused data in state-agency information systems (Dressel & Associates, 1971, p. 296; Purves & Glenny, 1976, p. 142) strongly suggests the need for a reduction in the number of data requests. The collection of unused data is very expensive "no matter how efficiently it was obtained" (Bassett, 1979a, p. 19), and, because institutions must bear the costs, they should be extremely wary of collecting, tabulating, and editing data that may never be used by those to whom it is delivered.

The first task, then, in improving institutional procedures for the generation of data is the establishment of a policy that the institution will not fill requests for data unless the external agency specifies how the data will be used. To do anything less will encourage the collection of inappropriate and misleading data and may overtax the institutional capacity for data generation.

Determining the agency's right to know. After determining the nature of the request and the likelihood that data will actually be used, institutional officers should ask whether the agency has the right to receive the information it has requested— that is, whether submission of requested data would result in the violation of laws protecting the privacy of individuals whose records are held by the institution. The Family Educational Rights and Privacy Act of 1974 (the so-called Buckley Amendment) requires the consent of students or their parents for the release of individual student records (Public Law 93-380, Title IV, Sec. 438, as amended, 20 U.S.C. Sec. 1232[g] Supp. IX, 1974). The Privacy Act of 1974 (Public Law 93-579, 5 U.S.C. Sec. 552[a]) prohibits the use of social security numbers as publicly available file identifiers. In addition, a number of states have laws designed to protect the privacy of citizens and their records (Hollander, 1978, p. 53). Dressel and Associates (p. 296) note the concern of institutional research officers for the protection of confidential records within their care. Computer-based records are, in some ways, more difficult to protect than are paper records for they are part of a larger collection to which many people may have at least partial access. *College and University Business Administration*, a manual of the National Association of College

*In Joseph D. Boyd *et al.* (1971).

and University Business Officers (1974, Sec. 2-5, p. 9) warns that "considerable quantities of confidential information relating to individuals are stored in computers. Depending on particular circumstances, the deliberate revelation of such data (through allowing access to computer files) may constitute actional invasions of privacy." The wholesale sharing of an institutional information system with staff of a state agency would be likely to be construed as an irresponsible, deliberate violation of the rights of individuals whose records are stored there.

Therefore, when faced with a request for data, college officers should avoid transmitting it in a format, or formats, which could compromise the private records of individuals whose privacy is protected by law.

Determining the probable cost. Finally, each request for data should, following the NCHEMS recommendation (Bassett, 1979(a), pp. 14–16) be analyzed for its probable cost to the institution. A state agency interested in the effectiveness of college programs might ask colleges to annually survey alumni satisfaction with those programs. The purpose for such a survey would be to yield valuable information on the performance of the college. But what would be the costs of the immense data collection effort? Could the college realistically be expected to finance it from current appropriations? What resources would it draw from the main work of the college, that is, the instruction of students?

Requests for unreasonably complex collections of data—like requests for information that will never be used—cost institutions money which might better be spent on instruction, service, and research. Unfortunately, there is evidence that state agencies are not always aware of what constitutes an unreasonably complex request. Purves and Glenny (p. 179) report finding no cases of careful documentation of software costs incurred by institutions in the course of establishing data bases for the preparation of reports to external agencies.

Estimates of cost must be based on a thorough understanding of the steps required in fulfilling a request for data:

1. Analyzing the request for data
2. Collecting the data
3. Monitoring the agency's analysis of the data
4. Reviewing the agency's use of the data in decision making
5. Evaluating the institution's data-reporting procedures.

Cost analysis of data requests should improve as institutions begin regularly to evaluate their data-reporting systems. Lacking such cost studies, college officers can roughly estimate the institution's capacity to respond promptly and effectively by reviewing the steps required to meet an individual data request. If the institution cannot commit sufficient funds to the task, the request for data can be returned immediately, with an explanation, to the agency which issued it. If the total request, or some parts of it, seem especially complex and time consuming, the institution might request a division of the request and state support for the more complicated, demanding tasks. If the request seems manageable, the external agency can be informed immediately of the institution's intent to comply and of the projected timetable.

Responsibility falls to the officers of institutions to carefully analyze each request for data in order to determine its probable cost.

Collecting the Data

The effective collection of institutional data—once a decision has been made to comply with an agency request—is not a simple process; rather, it requires a number of steps:

1. Affected departments of units must be notified of the study.
2. The inventory of existing data bases must be reviewed.
3. Appropriate formats for reporting requested data must be prepared, if they do not already exist.
4. Responsibility for actually collecting the data must be delegated organizationally.
5. The data collected must be properly tabulated and edited.
6. The edited data must be properly and promptly reported to those who requested it (and to others who have the right and need for it).
7. The data must either be incorporated permanently into the institution's internal management information system or be filed or recorded as an "occasional report" in a place readily accessible to institutional managers who could use it to improve their performance.

Monitoring the External Agency's Analysis of the Data

Colleges and universities cannot afford to assume that agencies will make fair and effective use of data—faulty agency analysis is all too common. Branches of state government, and the agencies which they have created, frequently succumb to the temptation to make policy recommendations based on just a cursory examination of what Purves and Glenny (p. 148) call collections of "assemblyline" data such as degrees granted or student hours generated. (See Berdahl, 1971, p. 119, for additional examples of shallow anlaysis.) Faulty agency analysis can effectively undermine accurate institutional reporting of performance data. No matter how carefully institutions collect, tabulate, edit, and report data, their efforts will be futile if the subsequent analysis leads to conclusions which do not truly reflect the data. Because colleges and universities invest an important part of their resources in the generation of information for external agencies, their own interests require that they monitor agency analysis to assure that reported information is analyzed adequately and properly.

The analysis of college-generated information is not a simple matter, however. The common denominator (money) which links effort (expenditures) and production (profit) in the private sector (Anthony, 1965, p. 41) is lacking in colleges and universities. Money cannot be used to measure the performance of educational institutions because their products are not sold on the open market. Because agency analysts often come from backgrounds in business and industry, however, there is a tendency for them to balance effort and production in judging the performance of institutions. When such assemblyline analysis is not linked to an understanding of

institutional mission and quality, questionable conclusions are reached.

Good programs, more experienced educational analysts know, frequently cost more money because they require more and better resources. This is not to say, of course, that the more expensive a program is, the greater its quality is. It *is* to say that programs cannot be judged on economy of operation alone. Uniqueness of mission may also drive the costs of academic programs upward. For example, a state may depend on a given university to produce a constant flow of licensed veterinarians. The question, then, will be whether that university should be faulted for "inefficiency" because its small program in veterinary medicine produces student credit hours at a cost higher than that of similar programs in neighboring states with larger schools of veterinary medicine.

An example of recurring, inadequate agency analysis of institutional data is documented by Purves and Glenny (pp. 145 & 148) who note the tendency of state agencies to ignore the distinction between fixed and variable costs faced by institutions with fluctuating enrollments. Although, for example, it may be simpler for legislators to send three hundred dollars more to a college for each extra full-time student it enrolls (or to deduct a like amount from its appropriation for each student not enrolled) it is a fact that an extra student enrolled causes only a marginal increase in costs. Although that extra student may require a dormitory room, textbooks, etc., he or she creates no additional need for sidewalks, administration buildings, or classroom heat. The savings of a single "disenrollment" are, similarly, marginal. Nevertheless, state agencies continue to recommend appropriations based on enrollment data alone.

Professional researchers agree that state agency analysis of data should take into account the unique history, mission, and geographical location of the college or university in any judgment of its performance (Dressel & Associates, pp. 296–297; Bowen & Glenny, 1976, p. 257). Yet, such considerations complicate the task of analysis and, for that reason, they may be ignored by agency staff who must struggle with limited resources against a series of imminent deadlines.

Who can hold the staff analysts to account for their work? Agency directors are poor candidates, for they are likely to be more concerned about the capacity of the agency to deliver some sort of analysis on time than about the adequacy of that analysis. Agency directors are accountable to executive or legislative branches of government and are employed by elected officials who hope that the agencies can defuse volatile political issues. The idea that political decision making can be replaced by the analysis of governmental staff is what Boguslaw (1965, p. 191) calls the ideal of the "new utopians." In the New Utopia, political problems are assigned to agency staff who make decision-oriented recommendations based on a "study" of "data." The politicians then follow the advice of the staff and, if criticized for their decisions, take refuge behind the "analysis" which the agency staff has performed.

If the quality of agency analysis is to be monitored and controlled, it will have to be monitored and controlled by representatives of the colleges and universities.

Reviewing the Agency's Use of Data in Decision Making

If a review of the relationship between reports of data and subsequent decisions reveals that an agency routinely collects institutional data merely to buttress decisions which its staff, or influential politicans, have already made, institutional officers should reevaluate their procedures for responding to that agency's requests for data (Purves & Glenny, p. 143). For example, if an agency persists in recommending that funding be tied to raw enrollment figures, a university would probably be wise to forego elaborate explanation of the uniqueness or quality of its programs. If budget requests are routinely cut by a standard percentage, regardless of demonstration of need, an institution might consider submitting a "dream budget" request in order to receive the sort of appropriation which is actually needed to support a viable academic program. In either case, where a state agency does not utilize the data in a serious way, an institution may cut costs of data collection significantly by revising its methods of responding.

On the other hand, if policy decisions are made as a result of careful agency analysis of institutionally derived data, colleges and universities would do well to invest more of their resources in carefully collecting, tabulating, editing, and reporting data to state agency staffs. Whether college officers spend more or less of their limited resources on the generation of data for state agencies should depend on whether they are dealing with new utopians or with what Williams (1965, pp. 177–178) calls the "human" decision makers for whom the "mastery of recorded facts is only a preliminary in arriving at academic policies." For these, he says, "nothing can supplant the human attributes that must come into play: sympathetic intelligence, imagination, courage, and integrity." For the new utopian, as we noted earlier, human attributes are more trouble than they are worth. Rather than engaging in the kind of debate which serious analysis requires, the utopian prefers to utilize data to support the prompt, efficient administrative delegation of decision making (Purves & Glenny, p. 143).

When colleges are faced with data requests from a new-utopian agency or legislative staff, they have little choice but to respond as players in a political game designed by the staff or the governmental body which created the agency and which uses the staff in a new-utopian style. In order to protect their institutions against those who use facts merely to support previous decisions, college and university officers may decide to provide just a minimum of information; such an attitude is already common among institutional officers in states where agencies are the pawns of political interest groups rather than conduits for the flow of accurate and reliable information (Miller, 1964, p. 23).

Evaluating Data-Reporting Procedures

Once every three years, college and university administrators should prepare a careful summary tabulation of the number of external data requests which they have received and the ways in which each was processed. Who was assigned the task of filling the request? With whom were the reports filed? To what extent did the generation of

reports improve the data bases of the institutional information system? Only through such monitoring procedures will the real institutional costs of generating data (in both time and money) be calculable.

All who are assigned the responsibility for responding to external data requests should have the advantage of training based on the lessons learned from such careful, periodic monitoring. Ideally, the director of institutional research—familiar both with technical methods for improving institutional reporting and with the internal and external political problems which such reporting can create—would be responsible for both the monitoring and the training. In the absence of an office of institutional research, the executive officer of a college might consider the preparation of a manual to guide those who have reporting responsibilities. The manual should cover the steps outlined in this paper—from analysis of the data request to ways in which institutional response to data requests might be evaluated.

Although the institution's general policy toward data collection efforts by state agencies may not be capable of encapsulation in the manual (especially in states where new utopians control state agencies), the manual *can* specify the need to consult with ranking executive officers of the institution prior to providing agencies with the information they request. The political context which affects agency-institution relationships at that time can then be reviewed.

No matter how institutions decide to go about improving their ability to respond to external requests for information, the task will not be simple; generating information is more complicated than it might seem. The complexity is compounded by political considerations which shape the meaning and significance of data requests. The policy of simply giving agencies what they ask for has been recommended by some. Berdahl, for example, (1971, p. 161) stated that if "institutions can suppress their distaste at having to fill out another set of papers . . . they will probably soon learn that board reactions will tend to be pro forma and thus fairly easy to live with." Such a view appears naive, for agencies frequently ask for data which they do not need and cannot use or, worse, which they may misuse. Purves and Glenny (p. 159), for example, note that, in the view of some persons, state-level requests for information are sometimes made "simply to place the institution on the defensive or embarrass it because it cannot provide the data." Carlson (1975, p. 102) states that the sheer volume of steadily increasing data requests is, itself, reason for taking a more sophisticated stance in response to state-level agency data requests.

The strategy of giving agencies all they ask for, hoping that they will eventually "choke" on the mass of data that is provided, hasn't worked. "State agencies," according to Cohen (1975, p. 4), "are like Hydras—if one chokes on the mass of data you shove in its craw, two others spring up by its side." If the Hydra is to be combated effectively, institutions must take the initiative in improving the rationality (and, thereby, the efficiency) of their procedures for submission of information to external agencies. In the end, the paperwork burden will be relieved only by those who are now compelled to bear it

References

Anthony, R. *Planning and control systems: A framework for analysis*. Cambridge, MA: Harvard Graduate School of Business, 1965.

Bassett, R. *Overview: Postsecondary education information planning at the state level*. Boulder, CO: National Center for Higher Education Management Systems (NCHEMS), 1979(a).

_____. *Planning guide: Postsecondary education information planning at the state level*. Boulder, CO: National Center for Higher Education Management Systems (NCHEMS), 1979(b).

Berdahl, R. *Statewide coordination of higher education*. Washington, D.C.: American Council on Education, 1971.

Boguslaw, R. *The new utopians: A study of system design and social change*. Englewood Cliffs, NJ: Prentice-Hall, Inc., 1965.

Bowen, F.M. & Glenny, L.A. *Statewide budgeting for higher education: State fiscal stringency and public higher education*. Berkeley, CA: Center for Research and Development in Higher Education, 1976.

Boyd, J.D. et al. *Comprehensive information systems for statewide planning in higher education*. Iowa City: American College Testing Program, 1971.

Carlson, E.M. Statewide coordination: The private ingredient. In R. Berdahl (Ed.), Evaluating Statewide Boards, *New Directions for Institutional Research* (No. 5). San Francisco: Jossey-Bass Inc., 1975.

Cohen, A.M. *Adapting institutional research to changing student populations*. Los Angeles: University of California at Los Angeles, 1975. (ERIC Document Reproduction Service No. ED 110 120)

Dressel, P.A. & Associates. *Institutional research in the university: A handbook*. San Francisco: Jossey-Bass Inc., 1971.

Hollander, P.A. *Legal handbook for educators*. Boulder, CO: Westview Press, 1978.

Miller, J.L. *State budgeting for higher education: Use of formulas and cost analysis*. Ann Arbor: Institute for Public Administration, The University of Michigan, 1964.

National Association of College and University Business Officers. *College and university business administration*. Washington, D.C.: Author, 1974.

Purves, R.A. & Glenny, L.A. *State budgeting for higher education: Information systems and technical analyses*. Berkeley, CA: Center for Research and Development in Higher Education, 1976.

Williams, R.L. *The administration of academic affairs in higher education*. Ann Arbor: The University of Michigan Press, 1965.

Bibliography

Huff, R.A. & Chandler, M.O. *A taxonomy of instructional programs in higher education*. Washington, D.C.: U.S. Government Printing Office, 1970.

McLaughlin, J.N. *Statewide measures inventory: An inventory of information relevant to statewide postsecondary education planning and management*. Boulder, CO: National Center for Higher Education Management Systems (NCHEMS), 1974. (ERIC Document Reproduction Service No. ED 093 254)

Moos, M. & Rourke, F.E. *The campus and the state*. Baltimore, MD: Johns Hopkins Press, 1969.

Ostar, A.W. On government and higher education. *Memo*, November 20, 1979, pp. 5–6.

Russell, J.D. & Doi, J.I. Analysis of institution expenditures. *College and University Business*, September 1955 through August 1956.

The *AIR Professional File* is published by the Association for Institutional Research, 314 Stone Building, Florida State University, Tallahassee, FL 32306. Distributed as an insert to the *AIR Newsletter*, the *Professional File* is intended as a presentation of papers which synthesize and interpret issues, operations, and research of interest in the field of institutional research. Paper authors are responsible for material presented. The editor is Richard R. Perry, Associate Vice President for Academic Affairs, The University of Toledo, 2801 W. Bancroft, Toledo, OH 43606.

© 1981 The Association for Institutional Research

END

DEPT. OF HEW

NAT'L INSTITUTE OF EDUCATION

ERIC

DATE FILMED

JULY 30 1981